

U.S. Department of Justice

United States Attorney Eastern District of New York

MAA/LB/CJN F. #2017R05903

271 Cadman Plaza East Brooklyn, New York 11201

August 13, 2024

By Email and ECF

Douglas A. Axel Michael A. Levy Jennifer Saulino Daniel Rubinstein Ellyce R. Cooper Melissa Colon-Bosolet Sidley Austin LLP

David Bitkower Matthew S. Hellman Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.

Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019 ("the Protective Order"). See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. <u>The Government's Discovery</u>

| Document Description | Category of Discovery Pursuant to Protective Order | Bates Range |
|---|--|--|
| Records regarding a Huawei employee. | Discovery Material ("DM") | DOJ_HUAWEI_A_0123787469 - DOJ_HUAWEI_A_0123787470 |
| Accounting and payroll records. | DM | DOJ_HUAWEI_A_0123787471 - DOJ_HUAWEI_A_0123787472 |
| Records regarding a Huawei vendor. | DM | DOJ_HUAWEI_A_0123787473 - DOJ_HUAWEI_A_0123787477 |

Very truly yours,

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By: /s/ Christian Nauvel

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